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April 28, 2010

VIA USPS

Jeffrey C. Londa
Ogletree Deakins Nash Smoak & Stewart, P.C.
500 Dallas Street, Suite 3000
Houston, Texas 77002-4709

RE: *Gandhi v. Dell, Inc., et al.*
Case No. 08-0248 (W.D. Tex.)

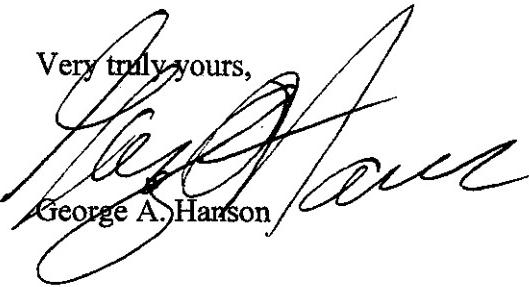
Dear Jeff:

Enclosed you will find Plaintiffs responses to Dell's First Set of Requests for Admission and Interrogatories served March 26, 2010. The parties have a different opinion regarding the scope of permissible and necessary discovery in this case. Plaintiffs contend that individual discovery on each and every opt-in class member is not permissible in this collective action – particularly the form of individual discovery Dell has propounded thus far. Dell appears to have taken the position that it is entitled to individualized discovery from all opt-in class members.

As you will see from our enclosed responses, Plaintiffs have objected to the discovery propounded and intends to object on a similar basis to all individual discovery unless and until the parties have agreed on a discovery plan. It is our position that Dell is entitled to take representative (not individual) discovery of the class. Accordingly, the parties should agree on the number of class members necessary for representative discovery and how those class members should be selected.

Pursuant to the objections raised in the enclosed discovery, Plaintiffs request a meet-and-confer with Dell, pursuant to L.R. 7(h), to discuss our objections and Dell's position and in the hope that there is some room for agreement on these issue. Please let me know your availability.

Very truly yours,



George A. Hanson

cc: Counsel of Record